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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Case No. 3:15-cr-00438-JO

Plaintiff,

v.

WINSTON SHROUT,

**UNOPPOSED MOTION FOR ORDER
AUTHORIZING LIMITED
DISCLOSURE OF UNREDACTED
PSYCHOLOGICAL EVALUATION TO
COURT-APPOINTED EXPERT**

Defendant.

The defendant, Winston ShROUT, through his attorney, Ruben L. Iñiguez, hereby moves the Court to enter an Order authorizing the limited disclosure of an unredacted copy of the psychological report previously filed under seal (CR 132) to Stephanie Maya Lopez, M.D., Chief Administrative Psychiatrist, Oregon Health & Science University, Portland, Oregon, for the sole and exclusive purposes of conducting a psychological or psychiatric examination, and preparing a report, in accordance with this Court's previous Order dated May 7, 2018 (CR 141) and Title 18, United States Code, Sections 4241(b) and

4247(b) and (c). The government, through Stuart A. Wexler and Lee F. Langston, Trial Attorneys, Tax Division, do not oppose this Motion.

Mr. Shrout's request for an Order authorizing the limited disclosure to Dr. Lopez of an unredacted copy of the prior report is expressly conditioned on his understanding, and the agreement of the parties, that the limited disclosure shall not be construed, in this or any other proceeding, as a waiver of the attorney-client or work product privilege, and the contents of the prior report shall not be used by the prosecution for any purpose other than the performance of the additional, court-ordered examination, the preparation of the additional, court-ordered report, the direct testimony of the court-ordered expert during any related hearing, and the cross-examination of the defense expert during any related hearing. This agreement applies to the entirety of the prior report, including, but not limited to, the previously redacted portions.

RESPECTFULLY submitted this 21st day of May, 2018.

/s/ Ruben L. Iñiguez

Ruben L. Iñiguez

Attorney for Defendant